

**EXHIBIT B**

Time and Expense Invoice

RANDI ELLIS, LLC  
ATTORNEY AT LAW\*  
(A LIMITED LIABILITY COMPANY)

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\*LICENSED IN LOUISIANA AND TEXAS

United States Bankruptcy Court  
District of New Jersey  
402 East State Street  
Trenton, NJ 08608

June 06, 2023  
Client: 001000  
Matter: 000001  
Invoice #: 160  
Resp. Atty: LMW  
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RE: In Re: LTL Management, LLC  
Case No.: 23-12825-MBK  
Judge: Michael B. Kaplan  
Chapter: 11

For Professional Services Rendered Through May 31, 2023

## SERVICES

Date	TMK	Task	Description of Services	Hours	Rate	Amount
4/5/2023	RE	B200	Review of Court order entering TRO and stay of Valdez trial (.1); review of Order Setting First Day Hearing (.1); review opposition by MR to FCR Motion to Appointment (.3); communications with counsel regarding same (.3).	0.8	\$1,015.00	\$812.00
4/6/2023	RE	B200	Communications with counsel regarding objection filed by MR (.6); review draft letter in response to the MR objection (.1); approve letter filed in response to MR objection (.1); prepare and revise declaration for Appointment as FCR (.4); communications with counsel regarding Motion and declaration (.3).	1.5	\$1,015.00	\$1,522.50
4/7/2023	RE	B200	Review and revise FCR declaration.	0.3	\$1,015.00	\$304.50
4/8/2023	RE	B200	Review and edits to Motion to Appoint FCR and declaration.	0.2	\$1,015.00	\$203.00
4/10/2023	RE	B200	Review of final Motion to Appoint FCR (.1); review of Valadez Motion for Relief from Stay (.1); review of Meso Claimants' Opposition to Debtor's Motion to File List of Top Law Firms (.1); review of Ad Hoc Committee's Informational Brief (.2); review of Maune Raichle's Statement Against Second Bankruptcy and Joinder of Ad Hoc Committee's Informational Brief (.1).	0.6	\$1,015.00	\$609.00

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**SERVICES**

Date	TMK	Task	Description of Services	Hours	Rate	Amount
4/11/2023	RE	B200	Review of Ad Hoc Committee's Objection to Debtor's First Day Relief (.1); review of Meso's Joinder Opposing Debtor's Motion to File Law Firms (.1); review of Maune Raichle Joinder to AHC's Objection to Debtor's First Day Relief (.1).	0.3	\$1,015.00	\$304.50
4/11/2023	RE	B140	Attend hearing via zoom.	6.0	\$1,015.00	\$6,090.00
4/13/2023	RE	B200	Review of Orders Suspending Standard Notice of Commencement, Granting Complex Chapter 11 Case Designation, and Setting hearings.	0.3	\$1,015.00	\$304.50
4/14/2023	RE	B200	Review of Notice of Agenda for April 18, 2023 hearing.	0.1	\$1,015.00	\$101.50
4/16/2023	RE	B200	Review of US Trustee's Notice of Appointment of TCC.	0.1	\$1,015.00	\$101.50
4/17/2023	RE	B200	Review of Reply to Debtor's "Oral Objections" to Valadez Motion for Stay Relief (.1); review of Debtor's Notice of Filing of List of Creditors (.1); review of Debtor's Objection to Motion Seeking Relief from Auto Stay, TRO, Injunction (.2); review of Revised Agenda for Hearing set for tomorrow (.1).	0.5	\$1,015.00	\$507.50
4/18/2023	RE	B140	Attend hearing by zoom.	9.0	\$1,015.00	\$9,135.00
4/19/2023	RE	B200	Review of Notice of Commencement of Chapter 11 Case (.1); review of Order Authorizing Debtor to File List of Law Firms (.1).	0.2	\$1,015.00	\$203.00
4/24/2023	RE	B200	Review of OCTC's Motion to Dismiss Bankruptcy (.2); review of OCTC's Motion to Seal (.1).	0.3	\$1,015.00	\$304.50
4/26/2023	RE	B200	Review of TCC's opposition to FCR appointment (.2); communications with counsel regarding objection by TCC (.3); review of Paul Crouch Objection to Debtor's Motion Appointing Randi Ellis as FCR (.2); review of Debtor's Motion Authorizing Debtor to Satisfy Obligations Under Prior Dismissal Order (.1); review of MR Objection to FCR (.2); review of US Trustee Objection to FCR (.1).	1.1	\$1,015.00	\$1,116.50
4/27/2023	RE	B200	Drafting and revising Supplemental Certification in Support of FCR Appointment (.8); communications with counsel regarding same and pending matters (.6); analyze Unredacted Objection to FCR by US Trustee (.2); analyze Unredacted Objection to FCR by TCC (.3); review of materials in support of FCR appointment (1.2); review of AHC of Meso's Motion to Certify Direct Appeal as to Kaplan's Preliminary Injunction Order (.1).	3.2	\$1,015.00	\$3,248.00

**SERVICES**

Date	TMK	Task	Description of Services	Hours	Rate	Amount
4/28/2023	RE	B200	Communications with counsel regarding next steps (.6); revising Supplemental Declaration in Support of Application for FCR (1.4).	2.0	\$1,015.00	\$2,030.00
4/30/2023	RE	B200	Review of Debtor's Omnibus Reply to Application to Appoint Randi Ellis (.3); review of MR Firm's Motion to Dismiss New LTL Bankruptcy (.1); review of Letter to counsel regarding subpoena and document production (.1); communications with counsel regarding document production (.4)search for documents(3.1).	4.0	\$1,015.00	\$4,060.00
5/1/2023	RE	B200	Review of Debtor's Letter to Kaplan as to Common Interest Privilege and Motions to Dismiss (.1); review of Notice of Agenda for May 3, 2023 Hearing (.1); drafting answers to discovery (.8); communications with counsel regarding same (.3).	1.3	\$1,015.00	\$1,319.50
5/2/2023	RE	B200	Review of US Trustee's Motion to Dismiss (.3); review of Arnold & Itkin Motion to Dismiss (.2); review of TCC's Notice of Filing of Writ of Mandamus (.1); review of Brown Rudnick Letter to Judge Kaplan in response to Debtor's letter of May 1, 2023 (.1); review of Valadez' Supplemental Request for Stay Relief (.1); review of Supplemental Declaration of John Kim (.1); search for documents responsive to the subpoenas(2.8) communications with counsel regarding Debtor's document production and review of same (.5).	4.2	\$1,015.00	\$4,263.00
5/2/2023	RE	B195	Travel from Houston to New Jersey to attend May 3, 2023 hearing.	6.2	\$507.50	\$3,146.50
5/3/2023	RE	B200	Meetings with counsel before and after May 3, 2023 hearing.	3.0	\$1,015.00	\$3,045.00
5/3/2023	RE	B140	Attend May 3, 2023 Hearing.	4.5	\$1,015.00	\$4,567.50
5/3/2023	RE	B195	Return Travel to Houston after May 3 hearing in Trenton.	7.7	\$507.50	\$3,907.75
5/4/2023	RE	B200	Draft, revise, and finalize Amended Certification FCR (.5); communications with counsel regarding next steps (.8).	1.3	\$1,015.00	\$1,319.50
5/5/2023	RE	B200	Review of MRHFM's Response to Ms. Ellis' Amended Supplemental Declaration (.1); communications with counsel regarding same (.2).	0.3	\$1,015.00	\$304.50
5/6/2023	RE	B200	Review of Paul Crouch Objection to Gary Russo as Mediator (.1); communications with mediator regarding same (.3).	0.4	\$1,015.00	\$406.00

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**SERVICES**

Date	TMK	Task	Description of Services	Hours	Rate	Amount
5/7/2023	RE	B200	Review of Maune Raichle's Objection to Debtor's Motion for Hearing on Disclosure Statement (.1); review of Statement of Assets and Liabilities of LTL Management LLC (.1).	0.2	\$1,015.00	\$203.00
5/8/2023	RE	B200	Review of Debtor's Response to Petition for Writ of Mandamus (.1); review of AHC of Supporting Firms' Response to Petition for Writ of Mandamus (.1); review of Maune Raichle's Objection to Gary Russo as Mediator (.1); review of Order Appointing Co-Mediators (.1); review of US Trustee's Motion to Compel (.1); review of Notice of Agenda and revised Notice of Agenda (.1); communications with mediators regarding next steps (.6).	1.2	\$1,015.00	\$1,218.00
5/9/2023	RE	B140	Attend hearing by zoom Ruling on FCR Motion.	4.5	\$1,015.00	\$4,567.50
5/9/2023	RE	B200	Communications with counsel regarding next steps (.4); review of Third Circuit Order Denying Petition for Writ of Mandamus (.1); review of Third Circuit Order Partially Denying Motion to Seal Petition Appendices (.1); review of Georgia State Court Claimants' Joinder to Motions to Dismiss (.1); review of AHC of Supporting Law Firms Rule 2019 Statement and Exhibits (.3).	1.0	\$1,015.00	\$1,015.00
5/10/2023	RE	B200	Communications with counsel regarding next steps (1.0); review of revised proposed order confirming FCR Appointment (.1); review of Text Order on May 16 Hearing (.1).	1.2	\$1,015.00	\$1,218.00
5/11/2023	RE	B200	Review of New Mexico and Mississippi Motion to Dismiss and Joinder (.2); review of TCC's Reservation of Rights as to Debtor's Retention of Professionals (.1); communications with counsel regarding status of Proposed Order Appointing FCR and next steps (.9).	1.2	\$1,015.00	\$1,218.00
5/12/2023	RE	B200	Review of AHC of States with Consumer Claims Verified 2019 Statement (.1); review of TCC's Motion to Commence and Prosecute Certain Claims (.1); review of MR Firm's Joinder to TCC's Reservation of Rights as to Debtor's Retention of Professionals (.1).	0.3	\$1,015.00	\$304.50
5/13/2023	RE	B200	Debtor's Cross-Motion for Protective Order (.1); review of TCC (Brown Rudnick) Letter as to Motions to Dismiss Scheduling (.1); review of Debtor's Omnibus ROR as to TCC Applications to Retain Professionals (.1); review of Debtor's Response Letter to TCC and Discovery Matters (.1); review of AHC of Supporting Firms' Objection to TCC's Cross-Motion Suspending Bankruptcy (.2); review of AHC of Supporting Firms' Reply as to Scheduling Motion (.1).	0.7	\$1,015.00	\$710.50

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**SERVICES**

Date	TMK	Task	Description of Services	Hours	Rate	Amount
5/14/2023	RE	B200	Review of Debtor's Reply to Motion for Hearing on Disclosure Statement (.1); review of Debtor's Reply to TCC's Cross-Motion to Suspend Bankruptcy (.1); review of Notice of Agenda for Hearing May 16, 2023 (.1); review of TCC's Motion to Compel (.2).	0.5	\$1,015.00	\$507.50
5/15/2023	RE	B200	Review of Transcript of 341 Meeting of Creditors (1.7); review of pleadings filed and set for May 16 hearing (.6); communications with counsel regarding next steps (.4).	2.7	\$1,015.00	\$2,740.50
5/16/2023	RE	B200	Review of Debtor's Response to Objections to Confidentiality Designations (.1); review of Debtor's Objection to TCC's Motion to Compel (.1); communications with counsel after zoom hearing to discuss next steps (.3).	0.5	\$1,015.00	\$507.50
5/16/2023	RE	B140	Attend Zoom Hearing.	3.5	\$1,015.00	\$3,552.50
5/17/2023	RE	B200	Initial Review of filed plan and disclosures filed with the Court on May 16, 2023 (3.8); communications with counsel regarding next steps (.4); call with counsel regarding next steps (.5); review of draft Application, proposed order, and certification for Retention of Walsh (.3); review of Order Denying TCC's Cross-Motion to Suspend (.1); review of Order Denying Motion to De-Designate Term Sheet Exhibit (.1); review of Order Governing Confidential Information as to TCC and Debtor (.2); review of Order Denying Debtor's Cross-Motion for Protective Order (.1); review of TCC's Several Professional Retention Applications (.2).	5.7	\$1,015.00	\$5,785.50
5/18/2023	RE	B200	Continued Review of filed plan and disclosures filed with the Court on May 16, 2023 (4.5); review of TCC's Corporate Disclosure Statement (.1); review of proposed case management order (.1); communications with counsel regarding proposed case management and next steps (.3); review of Order appointing FCR (.1); review of Final Application to Retain WPOF for FCR (.1); review of Text Orders on Scheduling and Appearances (.1).	5.3	\$1,015.00	\$5,379.50
5/19/2023	RE	B200	Communications with counsel regarding next steps (.2); analyze Debtor's filed Disclosures (1.8).	2.0	\$1,015.00	\$2,030.00

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**SERVICES**

Date	TMK	Task	Description of Services	Hours	Rate	Amount
5/22/2023	RE	B200	Review of the following Court's Order Establishing Compensation Procedures filings expert Docket entries on Motion Rescheduling (.1); review of Arnold & Itkin's Motion to Seal (.1); review of Debtor's option to Satisfy Obligations under Dismissal Order (.1); TCC's Motion to Seal (.1); MR Firm's Motion for Direct Appeal WITHDRAWN (.1); review of Monthly Operating Report (.1).	0.6	\$1,015.00	\$609.00
5/23/2023	RE	B200	Review of Order Authorizing Debtor to Satisfy Obligations (.1); communications with counsel regarding next steps (.2).	0.3	\$1,015.00	\$304.50
5/24/2023	RE	B200	Review of Debtor's Motion to Enter Expense Agreement with AHC of Supporting Firms (.1); review of Docket Entries Extending US Trustee's Objection Deadline to Applications to Retain Professionals (.1); review of Order Granting Debtor's Motion to Seal (.1).	0.3	\$1,015.00	\$304.50
5/25/2023	RE	B200	Review of Debtor's response and revised response to the Official Committee of Talc Claimants' letter to the Court, dated May 25, 2023.	0.2	\$1,015.00	\$203.00
5/26/2023	RE	B200	Zoom with counsel and mediators (.8); review of Appeal Notice of FCR appointment (.1); call with counsel regarding next steps and filings regarding review of counsel billing and expenses (.3); review of MR filing regarding objecting to Walsh retention (.1).	1.3	\$1,015.00	\$1,319.50
5/27/2023	RE	B200	Review, edit, and approve filings for Walsh retention (.2); communications with counsel regarding Walsh retention filing (.2); analyze Debtor's filed plan and filings regarding same (4.4).	4.8	\$1,015.00	\$4,872.00
5/29/2023	RE	B200	Review of letter and exhibits filed by TCC to the Court regarding MTC, Debtor's time records and funding agreement.	0.5	\$1,015.00	\$507.50
5/30/2023	RE	B140	Attending Omnibus zoom hearing before J. Kaplan.	1.3	\$1,015.00	\$1,319.50
5/30/2023	RE	B200	Communications with counsel regarding experts (.3); analyze 2nd Circuit decision and concurrence in Re: Purdue Pharma (1.3); review J&J Parties' Reply ISO Motion for Entry of Protective Order (.1); review of WPOF Letter Response to Objection to Application for Retention (.1).	1.8	\$1,015.00	\$1,827.00

## SERVICES

Date	TMK	Task	Description of Services	Hours	Rate	Amount
5/31/2023	RE	B200	Communications from and to M. Shakra regarding Canadian counsel (.1); communications with counsel regarding next steps (.6); communications from and to mediators regarding update and next meeting (.2); analyze plan and debtor's filing regarding same (2.8); review of Motion to Shorten Time Regarding Debtor's Motion for Bridge Order Confirming Automatic Stay Applies to Certain Actions (.1).	3.8	\$1,015.00	\$3,857.00
			Total Professional Services	104.8		\$99,317.75

## PERSON RECAP

Person		Hours	Rate	Amount
RE	Randi Ellis	13.9	\$507.50	\$7,054.25
RE	Randi Ellis	90.9	\$1,015.00	\$92,263.50

## EXPENSES

Date	Task	Description of Expenses	Amount
5/1/2023	E100 - E110	Airfare - Houston to Newark for 05-03-2023 hearing	\$507.80
5/2/2023	E100 - E109	Alto Receipt - Transportation to airport for hearing	\$131.36
5/3/2023	E100 - E109	Alto Receipt - Transportation from airport to home	\$98.12
5/3/2023	E100 - E110	Hotel - For 05-03-2023 hearing	\$551.44
		Total Expenses	\$1,288.72
		Total Services	\$99,317.75
		Total Disbursements	\$1,288.72
		Total Current Charges	\$100,606.47
		<b>PAY THIS AMOUNT</b>	<b>\$100,606.47</b>

*Due Upon Receipt. Please include the invoice number on all remittance. Thank you.*

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## TASK RECAP

Services		Disbursements		
Category	Hours	Amount	Category	Amount
B140	28.80	\$29,232.00	E100 - E109	\$229.48
B195	13.90	\$7,054.25	E100 - E110	\$1,059.24
B200	62.10	\$63,031.50		\$0.00
	<u>104.80</u>	<u>\$99,317.75</u>		<u>\$1,288.72</u>